

KSC/01.21.25
USAO 2024R00596

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

LESTER ARAELY RAMOS PEREZ,
MILTON LEON-MORALES,

Defendants

CRIMINAL NO. MJM 25 cr 9

(Firearms Trafficking Conspiracy,
18 U.S.C. § 933(a)(3); Firearms
Trafficking, 18 U.S.C. § 933(a)(1);
Dealing Firearms Without a License,
18 U.S.C. § 922(a)(1)(A); Possession of
Firearm by Prohibited Person, 18
U.S.C. § 922(g)(5); Conspiracy to
Distribute Controlled Substances, 21
U.S.C. § 846, 841(a); Forfeiture, 18
U.S.C. §§ 924(d) and 934(a)(1),
21 U.S.C. § 853, 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Conspiracy to Commit Firearms Trafficking)

The Grand Jury for the District of Maryland charges that:

From at least on or about October 9, 2024, continuing through the date of this Indictment,
in the District of Maryland, the Middle District of Alabama, the Northern District of Alabama
and elsewhere, the defendants,

LESTER ARAELY RAMOS PEREZ and
MILTON LEON-MORALES,

did knowingly combine, conspire, confederate, and agree together with each other and persons
known and unknown to the Grand Jury to ship, transport, transfer, cause to be transported, and
otherwise dispose of firearms, including:

DATE	FIREARMS
10.09.2024	Glock 26 9mm serial number AAEG130 Glock 19x 9mm serial number AHMV382 Glock 21 Gen 4 45 auto serial number BEXM523 Glock 17 9mm serial number GXL143 Glock 22 40 cal serial number KSL337 Remington 1911 R1 Enhanced 45 auto serial number RHD010798
11.02.2024	Micro Draco Pistol 7.62x39 serial number ROA 22 PMD-29747 equipped with extended magazine Glock 26 Gen 5 9mm serial number AEZV054 Glock 30 Gen 4 45 Auto serial number BSMH548 Glock 23 40 cal serial FNN685 equipped with machine gun conversion device Springfield Armory XD 9mm serial number BY263374 FNH USA FN Herstal 5.7x28 serial number 386187191 Armi Fratelli MOD BTA 90 9mm serial number 622505
11.14.2024	Glock 48 9mm serial number BLEA102 Smith & Wesson SW9VE 9mm serial number DSK2433 Mossberg 500A Shotgun 12 Gauge serial number J332297 Rock River Arms LAR – 15 Rifle 5.56 serial number CM01835
12.12.2024	Glock 21 .45 cal serial number BBLV477 Glock 21 .45 cal serial number BLFV068 Glock 17 9mm serial number ABPE071 Glock 17 9mm serial number ABPE069 Glock 21 .45 cal serial number XNS642 Colt Commander .45 cal serial number FL08120E Anderson Manufacturing AR15 .223 cal serial number 20238471
12.18.2024	Glock 17 9mm serial number VUG657 equipped with machine gun conversion device Glock 17 9mm serial number ZFD492 equipped with machine gun conversion device Glock 22 40 cal serial number VYX784 Glock 22 40 cal serial number WXW348 Glock 22 40 cal serial number BFAY960 Glock 19 9mm serial number BRNX998 Glock 19 9mm serial number BTCL806 Glock 17 9mm serial number ZFD303 Walter Arms 9mm serial number FCH1679 Canik 9mm serial number T7472-16 AT 14302 Ruger 5.7 cal serial number 643-10297 Anderson Manufacturing 15 Rifle serial number 21394099

to another person in and otherwise affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony.

18 U.S.C. § 933(a)(3)

COUNT TWO
(Firearms Trafficking)

The Grand Jury for the District of Maryland further charges that:

On or about October 9, 2024, in the District of Maryland, the defendant,

LESTER ARAELY RAMOS PEREZ,

did, ship, transport, transfer, cause to be transported, and otherwise dispose of firearms—that is, one Glock 26 9mm serial number AAEG130, one Glock 19X 9mm serial number AHMV382, one Glock 21 Gen 4 45 Auto serial number BEXM523, one Glock 17 9mm serial number GXL143, one Glock 22 serial number KSL337, and one Remington 1911 R1 Enhanced 45 auto serial number RHD010798—to another person in and otherwise affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony.

18 U.S.C. § 933(a)(1)

COUNT THREE
(Firearms Trafficking)

The Grand Jury for the District of Maryland further charges that:

On or about November 2, 2024, in the District of Maryland, the defendants,

LESTER ARAELY RAMOS PEREZ and
MILTON LEON-MORALES,

did, ship, transport, transfer, cause to be transported, and otherwise dispose of firearms—that is, one Micro Draco Pistol with extended magazine serial number ROA22PMD-29747, one Glock 26 Gen 5 serial number AEZV054, one Glock 30 Gen 4 serial number BSMH548, one Glock 23 serial number FNN685 equipped with a machine gun conversion device, one Springfield Armory XD Elite serial number BY263374, one FNH USA FN Herstal serial number 386187191, and one Armi Fratelli MOD BTA 90 9mm serial number 622505—to another person in and otherwise affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony.

18 U.S.C. § 933(a)(1)

COUNT FOUR
(Firearms Trafficking)

The Grand Jury for the District of Maryland further charges that:

On or about November 14, 2024, in the District of Maryland, the defendants,

LESTER ARAELY RAMOS PEREZ and
MILTON LEON-MORALES,

did, ship, transport, transfer, cause to be transported, and otherwise dispose of firearms—that is, one Glock 48 9mm serial number BLEA102, one Smith & Wesson SW9VE 9mm serial number DSK2433, one Mossberg 500A shotgun serial number J332297, and one Rock River Arms LAR 15 rifle serial number CS01835—to another person in and otherwise affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony.

18 U.S.C. § 933(a)(1)

COUNT FIVE
(Firearms Trafficking)

The Grand Jury for the District of Maryland further charges that:

On or about December 12, 2024, in the District of Maryland, the defendants,

LESTER ARAELY RAMOS PEREZ and
MILTON LEON-MORALES,

did, ship, transport, transfer, cause to be transported, and otherwise dispose of firearms—that is, one Glock 21 serial number BBLV477, one Glock 21 serial number BLFV068, one Glock 17 9mm serial number ABPE071, one Glock 17 9mm serial number ABPE069, one Glock 21 serial number XNS642, one Colt Commander serial number FL08140E, and one Anderson manufacturing AR15 serial number 20238471—to another person in and otherwise affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony.

18 U.S.C. § 933(a)(1)

COUNT SIX
(Dealing Firearms Without a License)

The Grand Jury for the District of Maryland further charges that:

From at least on or about October 9, 2024, continuing through the date of this Indictment, in the District of Maryland, the Middle District of Alabama, the Northern District of Alabama and elsewhere, the defendant,

LESTER ARAELY RAMOS PEREZ,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 924(a)(1)(D)

COUNT SEVEN
(Dealing Firearms Without a License)

The Grand Jury for the District of Maryland further charges that:

From at least on or about October 9, 2024, continuing through the date of this Indictment, in the District of Maryland, the Middle District of Alabama, the Northern District of Alabama and elsewhere, the defendant,

MILTON LEON-MORALES,

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms.

18 U.S.C. § 922(a)(1)(A)

18 U.S.C. § 924(a)(1)(D)

COUNT EIGHT

(Possession of a Firearm by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about October 9, 2024, in the District of Maryland, the defendant,

LESTER ARAELY RAMOS PEREZ,

knowing he was an alien illegally or unlawfully in the United States, did knowingly possess firearms—that is, one Glock 26 9mm serial number AAEG130, one Glock 19x 9mm serial number AHMV382, one Glock 21 Gen 4 45 auto serial number BEXM523, one Glock 17 9mm serial number GXL143, one Glock 22 40 cal serial number KSL337, and one Remington 1911 R1 Enhanced 45 auto serial number RHD010798—and the firearms were in and affecting commerce.

18 U.S.C. § 922(g)(5)

COUNT NINE

(Possession of a Firearm by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about November 14, 2024, in the District of Maryland, the defendant,

MILTON LEON-MORALES,

knowing he was an alien illegally or unlawfully in the United States, did knowingly possess firearms—that is, one Glock 48 9mm serial number BLEA102, one Smith & Wesson SW9VE 9mm serial number DSK2433, one Mossberg 500A Shotgun 12 Gauge serial number J332297, and one Rock River Arms LAR – 15 Rifle 5.56 serial number CM01835—and the firearms were in and affecting commerce.

18 U.S.C. § 922(g)(5)

COUNT TEN
(Conspiracy to Distribute a Controlled Substance)

The Grand Jury for the District of Maryland further charges that:

From at least on or about October 9, 2024, continuing through the date of this Indictment, in the District of Maryland, the defendants,

LESTER ARAELY RAMOS PEREZ and
MILTON LEON-MORALES,

did knowingly, willfully and unlawfully conspire, confederate and agree with each other, and with other persons known and unknown to the Grand Jury to distribute and possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

21 U.S.C. § 846

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 924(d) and 934(a)(1), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the defendants' convictions under any of the offenses alleged in Counts One through Ten of this Indictment.

Narcotics Forfeiture

2. Upon conviction of the offense alleged in Count Ten of this Indictment, the defendants,

**LESTER ARAELY RAMOS PEREZ and
MILTON LEON-MORALES,**

shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and
- b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

Firearms Trafficking Forfeiture

3. Upon conviction of the offense(s) alleged in Counts One through Nine of this Indictment, the defendants,

**LESTER RAMOS-PEREZ and
MILTON LEON-MORALES,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 934(a)(1):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s); and

- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense(s).

Firearms and Ammunition Forfeiture

4. Upon conviction of the offense(s) alleged in Counts One through Nine of this Indictment, the defendants,

**LESTER ARAELY RAMOS PEREZ and
MILTON LEON-MORALES,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in such offense(s).

Property Subject to Forfeiture

5. The property to be forfeited includes, but is not limited to: a forfeiture money judgment in the amount of proceeds each defendant obtained as a result of any of the offenses alleged in Counts One through Ten of this Indictment.

Substitute Assets

6. If, as a result of any act or omission of any defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 924(d)
18 U.S.C. § 933(a)(1)
21 U.S.C. § 853
28 U.S.C. § 2461(c)

Erek L. Barron/KYH

Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date: January 22, 2025